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Attorneys for Plaintiff and the Putative Class

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

FRANCINE EDWARDS, individually)	Case No. 2:18-CV-01998-APG-PAL
and on behalf of all others similarly)	
situated,)	SECOND STIPULATION TO
)	EXTEND TIME TO RESPOND
<i>Plaintiff,</i>)	
)	Complaint filed: October 17, 2018
v.)	
)	
CONN'S, INC. and CONN)	
APPLIANCES, INC.)	
)	
<i>Defendants.</i>)	

1 Plaintiff FRANCINE EDWARDS, individually and on behalf of all others
2 similarly situated (“Plaintiff”), by and through her counsel of record, and Defendants
3 CONN’S, INC. and CONN APPLIANCES, INC. (“Defendants”), by and through
4 their counsel of record, hereby submit this agreement and stipulation to extend the
5 time for Plaintiff to respond to [28] Defendants’ 12(b)(6) Motion to Dismiss for
6 Failure to State a Claim on Which Relief Can Be Granted, [29] Motion to Dismiss
7 Non-Nevada Putative Class Members’ Claims for Lack of Personal Jurisdiction, and
8 [30] Motion to Strike Failsafe Class Allegations and Impertinent and Immaterial
9 Matter [Doc. No.’s. 28, 29, and 30] (“the Motions”) pursuant to LR IA 6-1.

10 Plaintiff’s current deadline to respond to all three motions is next Monday,
11 April 1, 2019. Plaintiff and Defendants stipulate and agree Plaintiff shall have an
12 additional two weeks until April 15, 2019 to file her responses to the three Motions.
13 Two days ago, Defendants also filed a Motion to Stay Discovery which requires
14 Plaintiff to draft and file a response to this additional fourth motion filed by
15 Defendants.

16 Plaintiff filed her Original Class Action Complaint on October 17, 2018. After
17 reviewing Defendants’ three Motions, and having recent conversations with
18 Defendants’ counsel, Plaintiff now seeks to amend her complaint to add specific facts
19 and more detailed allegations against Defendants and their agents. However, Plaintiff
20 cannot spend time amending the complaint while also drafting and responding to the
21 three pending Motions to dismiss and fourth Motion to Stay Discovery.

22 This is Plaintiff’s second request for an extension of time to respond to these
23 Motions. It’s not intended to cause any delay or prejudice to any party, but rather
24 to allow sufficient time for Plaintiff to draft and file three responses to Defendants’
25 pending Motions to dismiss and a fourth response to Defendants’ recent Motion to
26 Stay Discovery.

27 **IT IS SO STIPULATED.**
28

1 Dated: March 28, 2019.

2 **RESPECTFULLY SUBMITTED & AGREED:**

3 /s/ W. Craft Hughes

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**Pro Hac Vice*
Attorneys for Defendants,
Conn's Inc. and Conn Appliances, Inc.

24 **IT IS SO ORDERED.**

25 Dated this 28th day of March 2019.

26 
27 ANDREW P. GORDON

28 UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF CONFERENCE

/s/ *W. Craft Hughes*

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